



**{In Archive} EPA Review Comments on WGSL deliverables of 1 & 4 February 2011**

**Stephen Tyahla** to: jwhelan1

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Cc: lene.ichinotsubo, steven.chang, stuart.yamada, alec.wong, Steve Armann, Bret Moxley, Ellen Blake, David Wampler

Bcc: Dean Higuchi, Rich Vaille, Steve Wall

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Joe,

EPA has completed its review of the five deliverables you submitted on 1 February and one of the two deliverables you provided on 4 February in accordance with our 25 January 2011 Administrative Order on Consent ("AOC") concerning the Waimanalo Gulch Sanitary Landfill ("WGSL"). We also completed our review of the "Revised Storm Water Management Update & Contingency Plan" you submitted on 1 February 2011 per Condition # 4 of EPA's 28 January 2011 e-mail that conditionally approved re-opening of Cell E6.

Our detailed comments are provided in the **attached table**. Revised work plans or items requiring revision are to be submitted to EPA within 15 days of your receipt of these comments (therefore, by **Friday, 25 February 2011**).

Here is a summary of the results of our review:

- [1] "Description of collection & treatment associated with liquid located behind the temporary berm" (submitted per AOC paragraph 19.d.)-**Acceptable with incorporation of the provided comments ; revision and resubmission required .**
- [2] "Work plan for managing potential Cell E6 hydraulic head" (Geosyntec Consultants' letter of January 31, 2011; submitted per AOC paragraph 19.e.)-**Approved, resubmission is not required; concurrence on due date (March 7, 2011) is required.**
- [3] "Work plan for restoration of sedimentation basin" (GEI Consultants' letter of January 31, 2011; submitted per AOC paragraph 19.h.)-**Acceptable with incorporation of the provided comments ; revision and resubmission required .**
- [4] "Work plan for beach assessment & material recovery effort" (submitted per AOC paragraph 19.i.)-**Acceptable with incorporation of the provided comments ; revision and resubmission required .**
- [5] "Revised Storm Water Management Update & Contingency Plan" (submitted per Condition 4) of EPA's 28 January 2011 e-mail that conditionally approved re-opening of Cell E6)-**Acceptable with incorporation of the provided comments ; revision and resubmission required .**
- [6] "Facility Health & Safety Plan" (submitted per AOC paragraph 21.)-**Plan is accepted; resubmission is not required.**
- [7] "Waimanalo Gulch Landfill Workplan for Liner Evaluation and Repair" (Geosyntec Consultants' letter of January 27, 2011); (submitted per AOC paragraph 19.f.)-**Plan is accepted; resubmission is not required, there are no comments on attached table for this workplan . However, concurrence by WMH on a deadline for completing the repair work , including completion of the CQA Report , is necessary. Based on the schedule provided and allowing 14 days for completion of the CQA report , EPA proposes a due date of 25 April 2011.**

EPA is in the process of retaining outside technical support to review the "Waimanalo Gulch Landfill Slope Stability Analysis and Work Plan for Liner Evaluation and Repair" (Geosyntec Consultants' letter of February 2, 2011; submitted by WMH on 4 February per AOC paragraph 19.a.). We will respond to that

submission as soon as practicable.

Please don't hesitate to contact me if you have any questions on the above or attached comments.

Thanks,

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<b>EPA Comments on Waste Management of Hawaii (“WMH”) February 1, 2011 deliverables</b> submitted pursuant to EPA’s Administrative Order on Consent (“AOC”) for Removal Action, Waimanalo Gulch Sanitary Landfill (“WGSL”); U.S. EPA Region IX CERCLA Docket No. 09-2011-0007 and RCRA Docket No. 7003-09-2011-0001 of January 25, 2011	
<b>No.</b>	<b>Comment</b>
<b>“Description of collection &amp; treatment associated with liquid located behind the temporary berm” (submitted per AOC paragraph 19.d.)</b>	
1	General: While EPA is in general agreement with the approach being taken, <b>resubmission</b> of this description <b>is required</b> in order to respond to the comments below.
2	Please specify the date when WMH began pumping liquids from behind the temporary berm and hauling to wastewater treatment facilities.
3	Please provide, broken down by date and wastewater treatment plant, the volume of water hauled to wastewater treatment plants (upon completion, same type of information will be in the Final Report).
4	WMH provided analytical results for a water sample collected from the sediment basin on January 13, 2011, presumably as representative of water be pumped and hauled from behind the temporary earthen berm near cell E6. If samples have been collected and analyzed from water retained by the earthen berm itself, please provide those data. Similarly, if additional water samples have been collected and analyzed from the sediment basin, please provide those data.
5	The Laboratory Final Data Summary Table provided lists “Screening Criteria” and “Benchmark Level” values. Please specify the source of these values.
6	There is no mention of any applicable pre-treatment standards for the receiving wastewater treatment facilities or what accommodations are being made with those facilities to comply with such standards. Please provide this information.
7	The description says that “At this point, all free liquids have been removed from behind the temporary berm in cell E6.” However, this contradicts the most recent daily report (of February 4, 2011) which explains that “The pumping contractor continues skimming water from the surface of the area south of Cell E6.” Please correct this discrepancy.
8	The description states that “The remaining sediment will be excavated and hauled to a bermed area on the landfill so that it can dry.” Please provide a map showing this “bermed area” location(s) and describe what underlies the

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<b>No.</b>	<b>Comment</b>
	area(s) (e.g., waste, liner & leachate collection). Also, if minimal drainage of residual water from this sediment is anticipated, please explain and justify.
<b>“Work plan for managing potential Cell E6 hydraulic head” (Geosyntec Consultants’ letter of January 31, 2011); (submitted per AOC paragraph 19.e.)</b>	
1	<p>General: EPA approves this work plan, but requests WMH’s concurrence on a proposed due date for a letter report documenting the results of the planned piezometric assessment. <b>Resubmission is not required; concurrence on due date is required.</b></p> <p>Under the paragraph “SCHEDULE,” it states that piezometer PZ-1 (if required) would be installed in approximately 20 days. Twenty days from February 1, 2011 is February 21<sup>st</sup> for completion of the potentially final piezometer. In order to allow time to produce a letter report containing the results of the assessment and recommended remedial measures (e.g., temporary extraction wells) if necessary, EPA proposes <b>March 7, 2011</b> as the due date for the post-assessment letter report, including recommended remedial measures.</p>
<b>“Work plan for restoration of sedimentation basin” (GEI Consultants’ letter of January 31, 2011); (submitted per AOC paragraph 19.h.)</b>	
1	General: The work plan and schedule are acceptable with incorporation of the below comments; <b>please resubmit</b> with appropriate revisions for final EPA approval.
2	Under the first paragraph entitled “Riprapped Embankment and Spillway,” 4 <sup>th</sup> sentence, it should be clarified that the “spillway apron” is an <u>emergency</u> spillway, consistent with the design drawings.
3	Under “Work Plan Activities,” paragraph “Vegetated Drainage Corridor,” there is no mention of plans to re-vegetate the area or install other means to mitigate sediment erosion and transport in that area. Upon EPA’s site visits in January 2011, it was observed that much of the underbrush had been grubbed leaving a significant amount of bare soil. Please provide recommended mitigation measures.
4	Under the paragraph “Schedule,” it is stated “If storm water enters the basin prior to the removal of the sediments,

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	we would not discharge it as storm water, except in an emergency.” Please add “and only after consultation with the Hawaii Department of Health and EPA” to the end of that sentence.
5	With resubmission, please provide clearer copies of Attachment A (full-size drawings saved as pdf files are preferred).
<b>“Work plan for beach assessment &amp; material recovery effort” (submitted per AOC paragraph 19.i.)</b>	
1	General: The work plan and schedule are acceptable with incorporation of the below comments; <b>please resubmit</b> with appropriate revisions for final EPA approval.
2	Please specify where WMH’s point of contact and phone number to report findings of waste material on beaches have been provided. Specifically, who is the point of contact?
3	Please include a provision to provide the Hawaii Department of Health and EPA e-mail notifications on the completion of any cleanup responses performed by WMH on beaches or shorelines in response to either reports received or any WMH inspections.
<b>“Revised Storm Water Management Update &amp; Contingency Plan” (submitted per Condition 4) of EPA’s 28 January 2011 e-mail that conditionally approved re-opening of Cell E6)</b>	
1	General: The contingency plan is acceptable with incorporation of the below comments; <b>please resubmit</b> with appropriate revisions for final EPA approval
2	Please provide a map of the facility, with at least an approximate scale, showing the locations of both the temporary and under construction (e.g., diversion structure) storm water management features discussed in the contingency plan.
3	Under paragraph 4), please expand on what preparations are to be made in advance of a significant storm event.
4	Under paragraph 5), 4 <sup>th</sup> bullet, please expand on what specific monitoring (e.g., by whom, frequency, features inspected) and maintenance will be performed during storm events, both during and after regular work hours.
5	Please provide details on WMH's process for deciding when Cell E6 operations are to be shut-down due to rain

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	events and how such a shut-down would be executed. Include with these details a description of how WMH would secure waste within Cell E6 in anticipation of a significant rain event.
<b>“Facility Health &amp; Safety Plan” (submitted per AOC paragraph 21.)</b>	
1	General: WMH’s Injury and Illness Prevention Program (“IIPP”) and associated programs are acceptable as submitted. Resubmission is not required.